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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA, ) Case No. CR 24-00022-HSG  
13 Plaintiff, )  
14 v. ) STIPULATION TO EXCLUDE TIME FROM  
15 EVER ESAU SANCHEZ-MORADEL, ) MARCH 13, 2024 TO MAY 8, 2024  
16 Defendant. ) AND ORDER  
17 \_\_\_\_\_)

18  
19 It is hereby stipulated by and between counsel for the United States and counsel for the  
20 defendant EVER ESAU SANCHEZ-MORADEL that time be excluded under the Speedy Trial Act from  
21 MARCH 13, 2024 through MAY 8, 2024.

22 At the status conference held on MARCH 13, 2024, the government and counsel for the  
23 defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could  
24 continue to prepare, including by engaging in plea discussions with government counsel and reviewing  
25 the discovery produced, taking into account the exercise of due diligence. *See* 18 U.S.C.  
26 § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding  
27 the time from MARCH 13, 2024 through MAY 8, 2024 from computation under the Speedy Trial Act  
28 outweigh the best interests of the public and the defendants in a speedy trial. *See* 18 U.S.C.

1 § 3161(h)(7)(A).

2 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
3 counsel for the defendant to file this stipulation and proposed order.

4 IT IS SO STIPULATED.

5 Dated: March 20, 2024

ISMAIL J. RAMSEY  
United States Attorney

6  
7 /s/  
DANIEL N. KASSABIAN  
8 Assistant United States Attorney

9 JODI H. LINKER  
10 Federal Public Defender

11 /s/  
12 SEVERA L. KEITH  
13 Assistant Federal Public Defender  
Counsel for Defendant  
EVER ESAU SANCHEZ-MORADEL

14 ORDER

15 Based upon the facts set forth in the stipulation of the parties, the representations made to the  
16 Court on MARCH 13, 2024, and for good cause shown, the Court finds that time is excluded from  
17 MARCH 13, 2024 through MAY 8, 2024, and that failing to exclude the time from MARCH 13, 2024  
18 through MAY 8, 2024 would unreasonably deny defense counsel and the defendant the reasonable time  
19 necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C.  
20 § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from  
21 MARCH 13, 2024 through MAY 8, 2024 from computation under the Speedy Trial Act outweigh the  
22 best interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Therefore,  
23 and with the consent of the parties, IT IS HEREBY ORDERED that the time from MARCH 13, 2024  
24 through MAY 8, 2024 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.  
25 § 3161(h).

26 IT IS SO ORDERED.

27 Dated: 3/21/2024

  
HON. HAYWOOD S. GILLIAM, JR.  
United States District Judge

28 2090-8492-2113, v. 1